

United States Bankruptcy Court
Northern District of Illinois, Eastern Division

IN RE: Heidi Brown-Polk) Chapter 13
) Case No. 19 B 02277
Debtor(s)) Judge LaShonda A. Hunt

Notice of Motion

Heidi Brown-Polk
932 E. 46th St.
Chicago, IL 60653

Debtor Attorney: Jordan TraVaille Hoffman PC
via Clerk's ECF noticing procedures

On December 16, 2019 at 9:00 am, I will appear at the location listed to the right, and present this motion.

> Dirksen Federal Building
> 219 South Dearborn
> Courtroom 719
> Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Wednesday, December 4, 2019.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case for Failure to Make Plan Payments

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, pursuant to 11 U.S.C. §1307 [c] [6], stating:

On January 27, 2019, the debtor filed a petition under Chapter 13 of the Bankruptcy Code which was confirmed by the Court on June 17, 2019, for a term of 60 months with payments of \$1,112.00.

| | | | | |
|-------------------------------------|----------------------|-----------------|----------------------|------------------------|
| The status of the debtor's plan is: | <u>Current Month</u> | <u>Cash Due</u> | <u>Cash Received</u> | <u>Payment Default</u> |
| | 11 | \$10,930.42 | \$6,508.28 | \$4,422.14 |

A summary of the 12 most recent receipt items is set forth below:

Report Date: 12/03/2019
Due Each Month: \$1,112.00
Next Pymt Due: 12/26/2019

| <u>Date</u> | <u>Ref Num</u> | <u>Amount</u> | <u>Date</u> | <u>Ref Num</u> | <u>Amount</u> |
|-------------|----------------|---------------|-------------|----------------|---------------|
| 03/04/2019 | 5666079000 | \$1,000.00 | 03/29/2019 | 5737304000 | \$1,086.14 |
| 05/27/2019 | 5888444000 | \$1,086.14 | 07/09/2019 | 6003086000 | \$1,112.00 |
| 08/26/2019 | 6118380000 | \$1,112.00 | 10/04/2019 | 6229928000 | \$1,112.00 |

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312)431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE